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July 26, 2002

VIA EMAIL AND OVERNIGHT COURIER

Ms. April Mulqueen
Assistant Director, Telecommunications Division
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: Docket 01-33: MCI WorldCom Communications, Inc,
Request for a Growth Code in 857 NPA, Boston Rate
Center, to Meet a Specific Customer Need

Dear Ms. Mulqueen:

On July 12, 2002, MCI WorldCom Communications, Inc. ("WorldCom") requested that the Department enter an order overturning the decision of the North American Numbering Plan Administrator ("NANPA") to deny WorldCom's request for a growth code to meet a customer request for additional numbering resources to meet its specific needs.

Pursuant to your request, I am writing to supplement WorldCom's July 12 Request and to provide additional information regarding the customer's needs.

WorldCom's customer, the Federal Reserve Bank of Boston ("Bank" or "Customer"), requested new telephone numbers in the 857-973 NPA/NXX code. The Bank has explained that it is undertaking a nationwide initiative to ensure its telecommunications services have redundancy and that contingency plans are in place in case of an emergency.

It is the Bank's goal to establish network redundancy in each of its branches, including the Boston branch, by acquiring new telephone numbers that are as similar as possible to its existing numbers, such as those in the overlay 857 NPA. The Bank will assign seven-digit telephone numbers in the 857 NPA that are identical to the numbers currently assigned to its personnel and equipment in the 617 NPA. Because the telephone numbers in the 857-973 NPA/NXX will be served via WorldCom's facilities-based network, including WorldCom's fiber to the Customer's premises and WorldCom's local switch, and because the Bank's current telephone numbers in the 617-973 NPA/NXX are served via another's carrier's network facilities, assignment of the requested numbers will achieve the network redundancy that the Bank is seeking.

The requested numbers in the 857-973 NPA/NXX will be activated by the Bank and assigned. The numbers will be published along with the 617-973 numbers to the same distribution within the banking system that currently receives the Bank's telephone directories. The existing 617-973 numbers will be identified as the primary Direct Inward Dialing ("DID") numbers, whereas the new 857-973 numbers will be identified as backup emergency numbers. In addition, the new 857-973 numbers will be used as the Bank's primary Direct Outward Dialing ("DOD") numbers.

The Bank requires telephone numbers in the 2000-2999, 3000-3999, 4000-4999, and 5000-5999 blocks. WorldCom will return the remaining six unused thousands blocks to the numbering pool.

The Bank is implementing this plan in response to the September 11 events in New York City, during which the Bank's DID network at its New York branch was disabled and callers were unable to reach the Bank. Its goal is to provide an easy and reliable means for callers to reach the Bank in the event of an outage impacting its primary DID numbers. The Bank has already implemented this network emergency plan in New York City and has implemented similar contingency plans at its Dallas and San Francisco branches. The Bank plans to expand its emergency preparedness plan in all of its branches throughout the country.

Granting WorldCom's July 12 Request is clearly in the public interest, as it will facilitate the ability of a branch of the central bank of the United States to implement its emergency preparedness contingency plans. For all of the reasons discussed in the July 12 Request and in this supplemental letter, WorldCom respectfully requests that the Department grant WorldCom's request on an expedited basis and direct the numbering administrator to assign immediately the 857-973 code to WorldCom.

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If you have any additional questions regarding this request, please do not hesitate to contact me.

Respectfully submitted,

MCI WORLDCOM
COMMUNICATIONS, INC.

A handwritten signature in dark ink, appearing to read "Curtis L. Groves". The signature is fluid and cursive, with the first name "Curtis" being more prominent.

Curtis L. Groves

Copies: Mary L. Cottrell, Secretary
Michael Isenberg, Esq., Telecomms Dir.

Christopher J. McDonald, Esq.

D.T.E. 01-33 Service List (by email)